

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

VS.

NO.: 3:21-CR-107-NBB-RP

JAMARR SMITH, et al.

MOTION FOR CONTINUANCE

COMES NOW, the Defendant, Jamarr Smith (hereinafter “Smith”), by and through the undersigned counsel, and files this Motion for Continuance, and would state unto the Court as follows:

I.

On November 4, 2022, Smith timely filed a Motion to Suppress [74]. Smith expects the other defendants in the case will join in the motion.

II.

The issues raised by the Motion to Suppress are novel and concern matters of first impression in this district, with very little national case law on the issue as well. The defendants anticipate the need for an evidentiary hearing, with expert testimony, as to the matters raised in the motion.

III.

Therefore, in light of the foregoing, Smith respectfully requests a continuance of the trial in this case so that the Motion to Suppress may be fully argued and considered by the Court.

IV.

The government has no objection to this continuance, and in fact, indicates that it has additional grounds for continuance that it will assert in its response.

WHEREFORE, PREMISES CONSIDERED, the defendant, Jamarr Smith, respectfully requests a continuance of the trial setting in this case.

RESPECTFULLY SUBMITTED,

JAMARR SMITH

HICKMAN, GOZA & SPRAGINS, PLLC
Attorneys at Law
Post Office Drawer 668
Oxford, MS 38655-0668
(662) 234-4000 telephone
(662) 234-2000 facsimile
glewis@hickmanlaw.com

BY: /s/ Goodloe T. Lewis
GOODLOE T. LEWIS, MSB # 9889

CERTIFICATE OF SERVICE

I, GOODLOE T. LEWIS, attorney for JAMARR SMITH, do hereby certify that I have on this date electronically filed the foregoing document with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record, including:

Robert Mims
Office of the US Attorney
900 Jefferson Avenue
Oxford, MS 38655
rmims@usadoj.gov

DATED: November 9, 2022.

/s/ Goodloe T. Lewis
GOODLOE T. LEWIS

GOODLOE T. LEWIS, MSB # 9889
HICKMAN, GOZA & SPRAGINS, PLLC
Attorneys at Law
Post Office Drawer 668
Oxford, MS 38655-0668